



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

April 3, 2002

CERTIFIED MAIL # 7000 1530 0005 5348 6957

Mr. Keith Hoovis
Plant Manager
Yellowstone Plastics
3721 West 65th South
Idaho Falls, Idaho 83402

RE: T2-010508, Yellowstone Plastics, Inc. - Idaho Falls, Idaho
Final Tier II Operating Permit No. 019-00041

Dear Mr. Hoovis:

The Idaho Department of Environmental Quality (Department) is issuing Tier II Operating Permit Number 019-00041 for Yellowstone Plastics, Inc. in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Tier II Operating Permit is based on the information contained in your permit application and on the relevant comments received during the public comment period. This Tier II permit is effective immediately and supersedes your previous permit issued on December 2, 1998. Modification to and/or renewal of this Tier II permit shall be requested in a timely manner in accordance with the *Rules*.

Mr. Jorge Garcia of the Idaho Falls Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department strongly recommends attendance of your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, the Department encourages you to contact us


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TECHNICAL SERVICES OFFICE

to discuss any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Mike Simon at (208) 373-0502 or via e-mail at msimon@deq.state.id.us.

Sincerely,



Katherine B. Kelly
Administrator
Air Quality Division

KK/KB/sm

Enclosure

cc: M. Seymore, Air Quality Division
Rensay Owen, Idaho Falls Regional Office
Kent Barry, EQM
Sherry Davis, Technical Services
Laurie Kral, EPA Region 10

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**Air Quality
TIER II OPERATING PERMIT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: 019-00041

AQCR: 61

CLASS: SM

SIC: 2759

ZONE: 12

UTM COORDINATE (km): 410.4, 4809.9

1. PERMITTEE

Yellowstone Plastics, Inc.

2. PROJECT

Tier II Operating Permit – Synthetic Minor

3. MAILING ADDRESS

3721 West 65th South

CITY

Idaho Falls

STATE

ID

ZIP

83042

4. FACILITY CONTACT

Keith E. Hoovis

TITLE

Plant Manager

TELEPHONE

208-542-1200

5. RESPONSIBLE OFFICIAL

Keith E. Hoovis

TITLE

Plant Manager

TELEPHONE

208-542-1200

6. EXACT PLANT LOCATION

3721 W. 65th S., near exit 113 of I-15

COUNTY

Bonneville

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Flexographic printing (roller coating) of polyethylene plastic bags

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be a modification. Modifications are subject to Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.


KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: April 2, 2002

DATE EXPIRES: April 2, 2007

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LIST OF ACRONYMS

ACFM	Actual Cubic Feet Per Minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BACT	Best Available Control Technology
CFR	Code of Federal Regulations
CO	Carbon Monoxide
DEQ	Idaho Department of Environmental Quality
dscf	Dry Standard Cubic Feet
EF	Emission Factor
EPA	United States Environmental Protection Agency
gpm	Gallons Per Minute
gr	Grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
IC	Integrated Chip
IDAPA	Idaho Administrative Procedures Act
km	Kilometer
lb/hr	Pound Per Hour
MACT	Maximum Available Control Technology
MMBtu	Million British Thermal Units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
O ₃	Ozone
PM	Particulate Matter
PM ₁₀	Particulate Matter with an Aerodynamic Diameter of 10 Micrometers or Less
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration
PTC	Permit To Construct
PTE	Potential To Emit
SCC	Source Classification Code
scf	Standard Cubic Feet
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TSP	Total Suspended Particulates
T/yr	Tons Per Year
µm	Micrometers
VOC	Volatile Organic Compound

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Permittee: Yellowstone Plastics, Inc.
Location: Idaho Falls, Idaho

Date Issued: April 2, 2002
Date Expires: April 2, 2007

1. TIER II OPERATING PERMIT SCOPE

Purpose

- 1.1 The purpose of this Tier II operating permit is to make the facility a synthetic minor source and thus exempt from Tier I permitting under IDAPA 58.01.01.300.
- 1.2 This Tier II permit supersedes the following permit:
Permit To Construct #019-00041, issued October 13, 2000

Regulated Sources

The sources of emissions regulated in this Tier II operating permit (OP) include all sources at the plant. The primary sources emit volatile organic compounds (VOCs) and include: inks and solvent mixing; flexographic printing presses and dryers #1 and #2; and press cleanup operations.

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2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651.
[IDAPA 58.01.01.650-651, 5/1/94]
- 2.2 Unless specified elsewhere in this permit, the permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
[IDAPA 58.01.01.405.01, .07, 5/1/94]
- 2.3 Unless specified elsewhere in this permit, the permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall, at a minimum, include the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Odors

- 2.4 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
[IDAPA 58.01.01.775-776, 5/1/94
(Federally enforceable; however, this provision will become state-only enforceable upon removal from the SIP)]
- 2.5 Unless specified elsewhere in this permit, the permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.405.01, .07 (State-only), 5/1/94]

Visible Emissions

- 2.6 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which has greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.
IDAPA 58.01.01.625, 5/1/94]

Excess Emissions

- 2.7 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

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Reports and Certifications

- 2.8 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Idaho Falls Regional Office
900 N. Skyline
Suite B
Idaho Falls, Idaho 83402

[IDAPA 58.01.01.405.01, .11, 5/1/94]

Open Burning

- 2.9 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 5/1/94]

Fuel-burning Equipment

- 2.10 The permittee shall not discharge to the atmosphere from the natural gas-fired fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume.

[IDAPA 58.01.01.676-677, 5/1/94]

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3. EMISSIONS UNIT

3.1 Process Description

The facility is a flexographic printing operation that roller coats polyethylene plastic bags.

3.2 Control Description

None.

Emissions Limits

3.3 HAP and VOC Emissions Limits

For each rolling 12-month period, hazardous air pollutant (HAP), as defined in IDAPA 58.01.01.006 (*Rules for the Control of Air Pollution in Idaho*), usage at the facility shall be less than 10 tons of each HAP, or 25 tons of any combination of HAP. For each rolling 12-month period, VOC emissions from the facility shall be less than 99 tons.

[IDAPA 58.01.01.405.01, 5/1/94]

3.4 Opacity Limit

Emissions from each printer or dryer, or any other stack, vent, or functionally equivalent opening, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.405.01, 5/1/94]

Operating Requirements

3.5 Material Selection

The Permit to Construct and this Tier II OP were based upon the review and approval of information submitted as part of the permit application. The facility shall not use materials in the printing process (e.g., inks, solvents, etc.) that are different from those described in the permit application without complying with IDAPA 58.01.01.200 (*Rules for Control of Air Pollution in Idaho*).

[IDAPA 58.01.01.405.01, 5/1/94]

3.6 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM.

Monitoring and Recordkeeping Requirements

3.7 Throughput Monitoring

The permittee shall monitor and record the following information. A compilation of the most recent five years of records shall be kept onsite, in a log, and shall be made available to Department representatives upon request.

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- The mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis, in accordance with 40 CFR 63.829(d),
- The mass of all VOC containing materials used and the mass fraction of VOC present in each VOC containing material used, on a monthly basis,
- If materials used in the printing process (e.g., inks, solvents, etc.) are different from those described in the permit application, the permittee shall obtain an amended permit or qualify and comply with exemption criteria specified in IDAPA 58.01.01.220 and IDAPA 58.01.01.221, including record retention requirements.

[IDAPA 58.01.01.405.01, 5/1/94]

3.8 HAPs Emissions Monitoring

The permittee shall calculate on a monthly basis, the monthly emissions for each HAP, then calculate emissions of each HAP for the previous 12-month period to demonstrate compliance with Section 3.3 of this permit.

[IDAPA 58.01.01.405.01, 5/1/94]

3.9 VOCs Emissions Monitoring

The permittee shall calculate on a monthly basis, the total monthly emissions of VOCs, then calculate total VOCs emissions for the previous 12-month period to demonstrate compliance with Section 3.3 of this permit.

[IDAPA 58.01.01.405.01, 5/1/94]

Reporting Requirements

3.10 VOC and HAP Emissions

The permittee shall submit to the Department a quarterly report of the VOC and HAP emissions monitoring required by Permit Conditions 3.8 and 3.9. The report shall be submitted 30 days after the end of each calendar quarter.

[IDAPA 58.01.01.405.01, 5/1/94]

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4. TIER II PERMIT GENERAL PROVISIONS

- 4.1 All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101 et seq.
- 4.2 The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 4.3 The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - 4.3.1 To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 4.3.2 At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
5. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
6. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
7. In the event of any change in control or ownership of the source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
8. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be void.
9. The Director may require the permittee to develop a list of Operation and Maintenance Procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
10. Performance tests (i.e., air emissions source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

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The permittee shall submit a proposed test date for each performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five workdays advanced notice prior to conducting any rescheduled test, unless the Department approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior Department approval, which demonstrated compliance with the respective pollutant emission limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

11. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.